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June 22, 1999

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JUN 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, N.W.
Suite TW-A325
Washington, D.C. 20554

Re: RCN's IntraLATA Toll Dialing Parity Implementation Plan for Massachusetts
File No. NSD-L-98-121, CC Docket 96-98

Dear Ms. Salas:

Enclosed for filing with the Federal Communications Commission ("Commission") is an original and four copies of RCN Telecom Services of Massachusetts, Inc.'s ("RCN's") "IntraLATA Presubscription Implementation Plan" ("Plan") for Massachusetts. Pursuant to the Commission's June 18, 1999 Public Notice, RCN has enclosed two additional copies of the Plan for Mr. Al McCloud of the Commission's Network Services Division.

The Massachusetts Department of Public Utilities has not yet approved any intraLATA dialing parity plans. RCN, therefore, files its Plan in order to conform to the Commission's Order, released on March 23, 1999, directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999, if "a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan."¹

No. of Copies rec'd 0+4
List A B C D E

¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket 96-98, NSD File No. L-98-121, FCC 99-54 (rel. March 23, 1999).

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Thank you for your attention to this matter. Should you have any questions, do not hesitate to contact me at (202) 424-7877.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward W. Kirsch".

Edward W. Kirsch
Counsel for RCN Telecom Services
of Massachusetts, Inc.

Enclosures

cc: Joseph A. Kahl (w/enc.)
Russell M. Blau, Esq. (w/enc.)
Morton J. Posner, Esq. (w/enc.)

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**FEDERAL COMMUNICATIONS COMMISSION
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RCN TELECOM SERVICES, INC.

INTRALATA PRESUBSCRIPTION IMPLEMENTATION PLAN

INTRODUCTION

RCN Telecom Services, Inc. ("RCN") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where RCN is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

RCN will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service.

Appropriate tariffs will be revised and filed in accordance with this plan.

RCN will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXX).

All eligible RCN end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service.

RCN will notify potential carriers sixty days prior to the initial availability of presubscription in specific market areas. Carriers will have the option of participating in all market areas or in a specific market area. Carriers will be required to return a completed Participation Agreement(s). These documents will be provided to carriers as part of the RCN carrier correspondence process.

RCN will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to RCN.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the RCN switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

RCN will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

RCN customer contact representatives will process customer initiated PIC selections to RCN or to an alternative intraLATA carrier. Carriers will have the option of allowing the RCN representative to process PIC requests on their behalf.

RCN will not ballot or allocate their customer base. At the time of conversion, all customers will be PIC'D to RCN.

Alternative carriers may submit PIC changes to RCN via a fax/paper interface. Details regarding this process will be provided as part of our carrier correspondence.

RCN will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

RCN will provide customers with a confirmation notification of their PIC (RCN or an alternative carrier) selection.

RCN representatives will provide alternative carrier(s) names and contact telephone (if provided by carrier) to customers in random order upon customer request. RCN representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification codes or access code dialing instructions.

RCN representatives will not initiate or accept three-way calls from alternative carriers to discuss presubscription.

PRESUBSCRIBED INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line where a PIC change is made.

In an effort to reduce unauthorized PIC changes, RCN will offer intraLATA PIC Freeze service to all customers at no charge. PIC Freeze can only be initiated (or removed) by the customer requesting it through their RCN representative.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) 960 byte format via paper medium. RCN will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to RCN and retain their incumbent LEC telephone number(s), RCN, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the RCN telephone number.